

# EXHIBIT A

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**VIA ELECTRONIC MAIL**

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RE: Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

Dear Counsel:

On January 25, 2023, I sent you a list of dates I had available to schedule depositions in this matter. On January 27, 2023, Attorney Parks, you sent me a list of depositions you wished to take and ten selected dates you already knew, I was not available for. While such actions might be good for billing, they are a waste of my time.

Specifically, as to Adrian Melendez, Jr., and Petro Industrial Solutions, LLC, all the dates you suggested are dates I told you, I did not have available. As to Frank Kirsch, of the nine dates you suggested, you already knew I was not available for six of them.

Similarly, on January 27, 2023, you, Attorney Simone Francis, submitted dates for witness depositions you wanted to take on dates that you knew I would be unavailable.

As such, I suggest the following deposition schedule given the limited dates we all have available, which are:

- April 18, 2023
- May 19, 2023
- May 22 to 24, 2023, in the afternoon

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- May 25, 2023, in the morning
- June 14<sup>th</sup> to 16<sup>th</sup>, 2023
- June 19 to 23, 2023
- July 10, 2023

The dates after June 16, 2023, are a guess as no one gave availability after the cutoff date in the order.

Of course, this shows the sheer stupidity of arguing not to extend discovery until July 15, 2023. But you have bit off your nose to spite your face, so you can deal with it, and it will need to be you who explain why an extension is needed.

The following is my proposed deposition schedule, given the limited joint dates to conduct depositions:

Date:	Deponent:
<b>April 28, 2023</b>	Petro Industrial Solutions, LLC, and Adrian Melendez
<b>May 19, 2023</b>	David Smith
<b>May 22, 2023</b>	Martin Figueira
<b>May 23, 2023</b>	Charlotte Horowitz
<b>May 24, 2023, morning</b>	Tom Kologinczak
<b>May 25, 2023, afternoon</b>	Tom Kologinczak's continuation
<b>June 14, 2023</b>	30(b)(6) Island Project and Operating Services, LLC
<b>June 15, 2023</b>	30(b)(6) Vitol US Holding II CO & Vitol Virgin Islands Corp
<b>June 16, 2023</b>	Andrew Canning and 30(b)(6) OPTIS Europe, Ltd.
<b>June 19, 2023, afternoon</b>	Elias Rivera
<b>June 20, 2023</b>	30(b)(6) Versa Integrity and Acuren Inspection Services
<b>June 21, 2023</b>	30(b)(6) Traeger Brothers
<b>June 22, 2023</b>	Chetram Persaud, Rawle Granger, and Coury Hodge
<b>June 23, 2023</b>	Andreas Constantinou, Terrence Keogh, and Adrian Melendez, Sr.
<b>July 7, 2023</b>	Sebastian Meretti, Garry Stoker, and Kenia Johny
<b>July 10, 2023</b>	30(b)(6) Saintnals, LLC

Cordially,



Lee J. Rohn, Esq.

LJR/kj